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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury, 08 CR 0682 — JLS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARISELA CASTRO-JUAREZ (1),
MARISA MELENA MAFNAS (2),
DAVID MONTES (3),
JULIE HERNANDEZ (4),
RANDAL MARK PANTER (5),
LORENZO PECORARO (6),
JOSE PARADA-VELAZQUEZ (7),
JOHN WALTER SCHUH (8),

Defendants.

Criminal Case No. _____

I N D I C T M E N TTitle 18, U.S.C., Sec. 371;
Title 8, U.S.C.,
Sec. 1324(a)(2)(B)(ii) -
Conspiracy to Bring in Illegal
Aliens for Financial Gain;
Title 8, U.S.C.,
Secs. 1324(a)(1)(A)(ii) and
(v)(I) - Conspiracy to Transport
Illegal Aliens; Title 8, U.S.C.,
Sec. 1324(a)(2)(B)(ii) -
Bringing in Illegal Aliens for
Financial Gain; Title 8, U.S.C.,
Sec. 1324(a)(1)(A)(ii) and
(v)(II) - Transportation of
Illegal Aliens and Aiding and
Abetting; Title 18, U.S.C.,
Sec. 1957 - Engaging in Monetary
Transactions in Property Derived
from Unlawful Activity; Title 18,
U.S.C., Sec. 1956(a)(1)(B)(ii) -
Laundering of Monetary
Instruments; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 18, U.S.C., Sec. 982 -
Criminal Forfeiture

1 The grand jury charges:

2 Count 1

3 Beginning at a date unknown to the grand jury and continuing up
4 to and including August 1, 2007, within the Southern District of
5 California, and elsewhere, defendants MARISELA CASTRO-JUAREZ, MARISA
6 MELENA MAFNAS, DAVID MONTES, JULIE HERNANDEZ, RANDAL MARK PANTER,
7 LORENZO PECORARO, JOSE PARADA-VELAZQUEZ, and JOHN WALTER SCHUH, with
8 the intent to violate the immigration laws of the United States, did
9 knowingly and intentionally conspire together and with each other and
10 with other persons known and unknown to the grand jury, to commit
11 offenses against the United States, namely:

12 OBJECTS OF THE CONSPIRACY

13 1. To bring to the United States, aliens, knowing that the
14 persons were aliens, at a place other than a designated port of entry,
15 and at a place other than designated by the Commissioner of the
16 Immigration and Naturalization Service, with the intent to violate the
17 immigration laws of the United States, in violation of Title 8, United
18 States Code, Section 1324(a)(1)(A)(i).

19 2. To bring illegal aliens into the United States for the
20 purpose of commercial advantage and private financial gain; in
21 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

22 3. To transport and move illegal aliens within the United
23 States, knowing that such aliens had come to, entered, and remained
24 in the United States in violation of law, and with the intent to
25 violate the immigration laws of the United States, in violation of
26 Title 8, United States Code, Section 1324(a)(1)(A)(ii).

27 4. To conceal, harbor, and shield from detection, illegal
28 aliens, knowing that such aliens had come to, entered, and remained

1 in the United States in violation of law, and with the intent to
2 violate the immigration laws of the United States, in violation of
3 Title 8, United States Code, Section 1324(a)(1)(A)(iii).

4 OVERT ACTS

5 In furtherance of said conspiracy and to effect and accomplish
6 the objects thereof, the following overt acts, among others, were
7 committed within the Southern District of California, and elsewhere:

- 8 1. On or about October 24, 2001, defendant MARISELA CASTRO-
9 JUAREZ drove a Saturn station wagon from Mexico into the
10 United States at the San Ysidro, California, Port of Entry
11 carrying an undocumented alien concealed in a modified
12 dashboard compartment.
- 13 2. On or about June 13, 2002, defendant JOHN WALTER SCHUH
14 drove a Dodge Minivan that was registered to defendant
15 MARISA MELENA MAFNAS to an area approximately 9 miles east
16 of the Tecate, California, Port of Entry carrying eight
17 undocumented aliens concealed in the trunk.
- 18 3. On or about March 20, 2002, defendant MARISELA CASTRO-
19 JUAREZ drove a Volkswagon Jetta on State Route 94 near
20 Potrero, California, and placed a phone call to Jeri
21 Stephenson (not charged herein) instructing Stephenson to
22 "just drive eastbound" in a 2002 Dodge Caravan that
23 contained four undocumented aliens.
- 24 4. On or about January 9, 2004, defendant LORENZO PECORARO
25 rode as a passenger in a Ford Probe driven from Mexico into
26 the United States at the Otay Mesa, California, Port of
27 Entry carrying one undocumented alien concealed in a
28 modified dashboard compartment.

- 1 5. On or about March 25, 2004, defendant JOHN WALTER SCHUH
2 drove a Dodge Avenger from Mexico into the United States at
3 the San Ysidro, California, Port of Entry carrying three
4 undocumented aliens concealed in the trunk.
- 5 6. On or about May 7, 2004, defendant LORENZO PECORARO drove
6 a BMW 325 from Mexico into the United States at the San
7 Ysidro, California, Port of Entry carrying three
8 undocumented aliens concealed in the trunk of the vehicle.
- 9 7. On or about November 30, 2004, defendant MARISELA CASTRO-
10 JUAREZ drove a blue Volvo from Mexico into the United
11 States through the San Ysidro, California, Port of Entry,
12 picked up Juan Apolinar-Juarez (charged elsewhere) and
13 drove to a Burger King restaurant at the intersection of
14 Dairy Mart Road and West San Ysidro Boulevard, where
15 Apolinar-Juarez got out of the Volvo, walked over to a
16 nearby hotel, and got into the passenger side of a white
17 Pontiac occupied by Antolin Elias (charged elsewhere) and
18 three undocumented aliens in the back seat.
- 19 8. On or about September 14, 2005, defendant MARISA MELENA
20 MAFNAS drove a Mazda MX-6 from Mexico into the United
21 States at the San Ysidro, California, Port of Entry
22 carrying one undocumented alien concealed in a modified
23 dashboard compartment.
- 24 9. On or about September 16, 2005, Yesenia Garcia-Reyna
25 (charged elsewhere) drove a Volkswagon Beetle from Mexico
26 into the United States at the San Ysidro, California, Port
27 of Entry carrying three undocumented aliens in the
28 passenger compartment.

- 1 10. On or about October 3, 2005, Yesenia Garcia-Reyna drove a
2 Hyundai Elantra from Mexico into the United States at the
3 San Ysidro, California, Port of Entry carrying one
4 undocumented alien in the passenger compartment.
- 5 11. On or about October 5, 2005, Yesenia Garcia-Reyna drove a
6 Hyundai 300CD from Mexico into the United States at the
7 San Ysidro, California, Port of Entry carrying one
8 undocumented alien in the passenger compartment.
- 9 12. On or about November 6, 2005, defendant JOHN WALTER SCHUH
10 drove a Chevrolet Impala from Mexico into the United States
11 at the San Ysidro, California, Port of Entry carrying four
12 undocumented aliens concealed in the trunk.
- 13 13. On or about November 6, 2005, defendant JULIE HERNANDEZ
14 rode as a passenger in a Geo Metro driven from Mexico into
15 the United States at the San Ysidro, California, Port of
16 Entry carrying one undocumented alien concealed in a
17 modified dashboard compartment.
- 18 14. On or about November 12, 2005, defendant JULIE HERNANDEZ
19 drove a 1993 Chevrolet Geo from Mexico into the United
20 States at the Otay Mesa, California, Port of Entry carrying
21 one undocumented alien concealed in a modified dashboard
22 compartment.
- 23 15. On or about November 22, 2005, Yesenia Garcia-Reyna drove
24 a Ford Escort from Mexico into the United States at the San
25 Ysidro, California, Port of Entry carrying one undocumented
26 alien in the passenger compartment.
- 27 16. On or about December 13, 2005, defendant JULIE HERNANDEZ
28 drove a Mitsubishi Galant from Mexico into the United

1 States at the San Ysidro, California, Port of Entry
2 carrying one undocumented alien concealed in a modified
3 dashboard compartment.

4 17. On or about On January 5, 2006, Reynalda Gonzalez (charged
5 elsewhere) drove and Amber Ann Varao (charged elsewhere)
6 rode as a passenger in a Ford Aspire from Mexico into the
7 United States at the San Ysidro, California, Port of Entry
8 carrying one undocumented alien concealed under the
9 driver's seat.

10 18. On or about January 10, 2006, Wesley Dean Hardesty (charged
11 elsewhere) drove and Amber Ann Varao rode as a passenger in
12 a Geo Storm from Mexico into the United States at the
13 San Ysidro, California, Port of Entry carrying one
14 undocumented alien in the passenger compartment.

15 19. On or about January 17, 2006, Wesley Dean Hardesty drove a
16 Chevrolet Cavalier from Mexico into the United States at
17 the San Ysidro, California, Port of Entry carrying one
18 undocumented alien concealed in the side floorboard.

19 20. On or about January 24, 2006, Wesley Dean Hardesty rode as
20 a passenger along Highway 188 in a Hyundai Elantra that was
21 registered to defendant JOSE PARADA-VELAZQUEZ, with a
22 stated address of defendant MARISELA CASTRO-JUAREZ's home
23 at 1514 Amador Street in Chula Vista, California, that
24 contained two undocumented aliens in the passenger
25 compartment.

26 21. On or about January 31, 2006, Yesenia Garcia-Reyna drove
27 and Lizbeth Flores (charged elsewhere) rode as a passenger
28 in a Daewoo Lanos from Mexico into the United States at the

1 San Ysidro, California, Port of Entry carrying one
2 undocumented alien concealed in a modified dashboard
3 compartment.

4 22. On or about February 1, 2006, Wesley Dean Hardesty drove a
5 Pontiac Grand Am from Mexico into the United States at the
6 San Ysidro, California, Port of Entry carrying three
7 undocumented aliens concealed in the trunk.

8 23. On or about March 6, 2006, defendant MARISELA CASTRO-JUAREZ
9 rented a Dodge Caravan.

10 24. On or about March 12, 2006, defendant JOHN WALTER SCHUH
11 drove a Jeep Liberty near the intersection of Thing Road
12 and Humphries Road, California, with six undocumented
13 aliens in the passenger compartment.

14 25. On or about March 21, 2006, defendant LORENZO PECORARO
15 drove the Dodge Caravan that defendant MARISELA CASTRO-
16 JUAREZ rented carrying five undocumented aliens in the
17 passenger compartment.

18 26. On or about March 28, 2006, Ricardo Reyes (charged
19 elsewhere) picked up two undocumented aliens at the
20 McDonald's Restaurant, took them to his residence in
21 San Diego, California, and contacted the aliens' sponsors,
22 to arrange a meeting at the Denny's Restaurant in San
23 Clemente, California, where the sponsors would pick up the
24 aliens.

25 27. On or about March 29, 2006, Ricardo Reyes drove a Ford
26 Explorer in tandem with a Infiniti J30 driven by Joshua
27 Roman (charged elsewhere) toward the Interstate 5 Border
28 Patrol Checkpoint in San Clemente, California.

- 1 28. On or about March 29, 2006, Ricardo Reyes drove the Ford
2 Explorer to the rest area located at mile marker 59, and
3 Joshua Roman drove the Infiniti through the San Clemente
4 checkpoint with the two undocumented aliens in the back
5 seat of the vehicle.
- 6 29. On or about March 29, 2006, Wesley Dean Hardesty drove a
7 Ford Aspire to the Interstate 8 Border Patrol checkpoint
8 carrying an undocumented alien concealed on the floorboard
9 in the rear of the car.
- 10 30. On or about April 13, 2006, defendant RANDAL MARK PANTER
11 drove an Infiniti G20T from Mexico into the United States
12 at the San Ysidro, California, Port of Entry carrying three
13 undocumented aliens concealed in the trunk.
- 14 31. On or about June 16, 2006, Yesenia Garcia-Reyna drove a
15 Chrysler PT Cruiser to the State Route 94 Border Patrol
16 checkpoint carrying two undocumented aliens concealed in
17 the trunk and one undocumented alien concealed under a
18 blanket.
- 19 32. On or about July 16, 2006, defendant RANDAL MARK PANTER
20 drove and Wesley Dean Hardesty rode as a passenger in a
21 Dodge Neon to the Old Highway 80 Border Patrol checkpoint
22 near Pine Valley, California carrying two undocumented
23 aliens concealed in the trunk and one undocumented alien
24 concealed under a sign behind the rear seat.
- 25 33. On or about August 2, 2006, defendant MARISELA CASTRO-
26 JUAREZ, drove a Nissan Altima to a meeting with defendant
27 RANDAL MARK PANTER.
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- 1 34. On or about August 2, 2006, defendant RANDAL MARK PANTER
2 drove a rented Chrysler 300M to a "Kragen Auto Parts"
3 store, returned home to his residence where he installed
4 coil boosters on the suspension of the Chrysler 300M.
- 5 35. On or about August 2, 2006, defendant RANDAL MARK PANTER
6 and Patricia Prohl (not charged herein) drove the rented
7 Chrysler 300M to the Old Highway 80 Border Patrol
8 Checkpoint carrying three undocumented aliens concealed in
9 the trunk.
- 10 36. On or about August 10, 2006, Yesenia Garcia-Reyna drove and
11 Lizbeth Flores rode as a passenger in a Ford Escort to the
12 State Route 94 Border Patrol checkpoint near Jamul,
13 California carrying two undocumented aliens concealed in
14 the passenger compartment.
- 15 37. On or about August 14, 2006, defendant RANDAL MARK PANTER
16 drove defendant MARISELA CASTRO-JUAREZ's white Nissan
17 Altima, along Old Highway 80, three undocumented aliens
18 concealed in the trunk.
- 19 38. On or about September 24, 2006, Wesley Dean Hardesty drove
20 a Dodge Stratus to the State Route 94 Border Patrol
21 Checkpoint carrying three undocumented aliens concealed in
22 the trunk.
- 23 39. On or about October 25, 2006, defendant DAVID MONTES drove
24 a Honda Accord to the Interstate 8 Border Patrol Checkpoint,
25 near Pine Valley, California, carrying two undocumented
26 aliens concealed in the trunk.
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1 40. On or about January 25, 2007, Wesley Dean Hardesty drove a
2 Toyota Camry to the State Route 94 Border Patrol Checkpoint
3 carrying two undocumented aliens concealed in the trunk.

4 41. On or about February 15, 2007, defendant JOSE PARADA-
5 VELAZQUEZ exited his residence in Chula Vista, California,
6 and drove a Honda Accord to a gas station, wiped down the
7 trunk of the car, vacuumed the inside, and then drove to
8 Melrose Avenue in Chula Vista.

9 42. On or about February 15, 2007, defendant MARISELA CASTRO-
10 JUAREZ drove and defendant RANDAL MARK PANTER rode as a
11 passenger in a Toyota Sienna, rented by defendant MARISELA
12 CASTRO-JUAREZ, to Melrose Avenue and stopped next to the
13 Honda Accord occupied by defendant JOSE PARADA-VELAZQUEZ.

14 43. On or about February 15, 2007, defendant JOSE PARADA-
15 VELAZQUEZ exited the Honda Accord and delivered set of keys
16 to defendant RANDAL MARK PANTER.

17 44. On or about February 15, 2007, defendant MARISELA CASTRO-
18 JUAREZ drove and defendant JOSE PARADA-VELAZQUEZ rode as a
19 passenger in a Toyota Sienna away from the meeting at
20 Melrose Avenue.

21 45. On or about February 15, 2007, defendant RANDAL MARK PANTER
22 drove the Honda Accord to the State Route 94 Border Patrol
23 Checkpoint carrying three undocumented aliens concealed in
24 the trunk.

25 46. On or about March 9, 2007, defendant DAVID MONTES drove and
26 defendant MARISELA CASTRO-JUAREZ rode as a passenger in a
27 Chrysler Sebring, that was rented by defendant MARISELA
28

1 CASTRO-JUAREZ, on East Palomar Street in Chula Vista,
2 California.

3 47. On or about March 10, 2007, defendant DAVID MONTES drove
4 the Chrysler Sebring to the State Route 94 Border Patrol
5 Checkpoint near Dulzura, California, carrying two
6 undocumented aliens in the passenger compartment.

7 48. On or about August 1, 2007, defendant JOHN WALTER SCHUH
8 drove a Chevy Malibu to the Interstate 8 United States
9 Border Patrol Checkpoint carrying two undocumented aliens
10 concealed in the trunk of the vehicle.

11 49. On or about January 25, 2008, defendant MARISA MELENA
12 MAFNAS drove a Honda Accord to the Interstate 8 United
13 States Border Patrol Checkpoint carrying two undocumented
14 aliens concealed in the trunk of the vehicle.

15 All in violation of Title 18, United States Code, Section 371.

16 Count 2

17 On or about January 9, 2004, within the Southern District of
18 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,
19 with the intent to violate the immigration laws of the United States,
20 knowing and in reckless disregard of the fact that an alien, namely,
21 Luisa Cortes-Matias, had not received prior official authorization to
22 come to, enter and reside in the United States, did bring to and
23 attempt to bring to the United States said alien for the purpose of
24 commercial advantage and private financial gain; in violation of
25 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
26 United States Code, Section 2.

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1 come to, enter and reside in the United States, did bring to and
2 attempt to bring to the United States said alien for the purpose of
3 commercial advantage and private financial gain; in violation of
4 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
5 United States Code, Section 2.

6 Count 6

7 On or about May 7, 2004, within the Southern District of
8 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,
9 with the intent to violate the immigration laws of the United States,
10 knowing and in reckless disregard of the fact that an alien, namely,
11 Maria Salas-Carrillo, had not received prior official authorization
12 to come to, enter and reside in the United States, did bring to and
13 attempt to bring to the United States said alien for the purpose of
14 commercial advantage and private financial gain; in violation of
15 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
16 United States Code, Section 2.

17 Count 7

18 On or about May 7, 2004, within the Southern District of
19 California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO,
20 with the intent to violate the immigration laws of the United States,
21 knowing and in reckless disregard of the fact that an alien, namely,
22 Alicia Santiago, had not received prior official authorization to come
23 to, enter and reside in the United States, did bring to and attempt
24 to bring to the United States said alien for the purpose of commercial
25 advantage and private financial gain; in violation of Title 8, United
26 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States
27 Code, Section 2.

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Count 8

On or about May 7, 2004, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Eduardo Reyes, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 9

On or about September 14, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA MAFNAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Carla Chavarin-Carmona, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 10

On or about September 16, 2005, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Marta Munoz-Josefina, had not received prior official authorization to come to,

1 enter and reside in the United States, did bring to and attempt to
2 bring to the United States said alien for the purpose of commercial
3 advantage and private financial gain; in violation of Title 8, United
4 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States
5 Code, Section 2.

6 Count 11

7 On or about October 3, 2005, within the Southern District of
8 California, defendant MARISELA CASTRO-JUAREZ, with the intent to
9 violate the immigration laws of the United States, knowing and in
10 reckless disregard of the fact that an alien, namely, Evangelina
11 Alfaro-Garcia, had not received prior official authorization to come
12 to, enter and reside in the United States, did bring to and attempt
13 to bring to the United States said alien for the purpose of commercial
14 advantage and private financial gain; in violation of Title 8, United
15 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States
16 Code, Section 2.

17 Count 12

18 On or about October 5, 2005, within the Southern District of
19 California, defendant MARISELA CASTRO-JUAREZ, with the intent to
20 violate the immigration laws of the United States, knowing and in
21 reckless disregard of the fact that an alien, namely, Maribel Rios-
22 Murrillo, had not received prior official authorization to come to,
23 enter and reside in the United States, did bring to and attempt to
24 bring to the United States said alien for the purpose of commercial
25 advantage and private financial gain; in violation of Title 8, United
26 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States
27 Code, Section 2.

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Count 13

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Guillermina Contreras-Calderon, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 14

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Dora Nely Beltran-Frias, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 15

On or about November 6, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Erika Vanessa Hernandez-Ramos, had not received prior official

1 authorization to come to, enter and reside in the United States, did
2 bring to and attempt to bring to the United States said alien for the
3 purpose of commercial advantage and private financial gain; in
4 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
5 and Title 18, United States Code, Section 2.

6 Count 16

7 On or about November 6, 2005, within the Southern District of
8 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,
9 with the intent to violate the immigration laws of the United States,
10 knowing and in reckless disregard of the fact that an alien, namely,
11 Jesus Millan-Hernandez, had not received prior official authorization
12 to come to, enter and reside in the United States, did bring to and
13 attempt to bring to the United States said alien for the purpose of
14 commercial advantage and private financial gain; in violation of
15 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
16 United States Code, Section 2.

17 Count 17

18 On or about November 6, 2005, within the Southern District of
19 California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ,
20 with the intent to violate the immigration laws of the United States,
21 knowing and in reckless disregard of the fact that an alien, namely,
22 Sergio Hernandez-Mares, had not received prior official authorization
23 to come to, enter and reside in the United States, did bring to and
24 attempt to bring to the United States said alien for the purpose of
25 commercial advantage and private financial gain; in violation of
26 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
27 United States Code, Section 2.

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Count 18

On or about November 12, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Rosalia Rodriguez-Rodriguez, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 19

On or about November 22, 2005, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Isabel Portillo-Aguilar, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 20

On or about December 13, 2005, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and JULIE HERNANDEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Francisco Zaragoza-Basulto, had not received prior official

1 authorization to come to, enter and reside in the United States, did
2 bring to and attempt to bring to the United States said alien for the
3 purpose of commercial advantage and private financial gain; in
4 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),
5 and Title 18, United States Code, Section 2.

6 Count 21

7 On or about January 5, 2006, within the Southern District of
8 California, defendant MARISELA CASTRO-JUAREZ, with the intent to
9 violate the immigration laws of the United States, knowing and in
10 reckless disregard of the fact that an alien, namely, Jaime Lopez-
11 Hernandez, had not received prior official authorization to come to,
12 enter and reside in the United States, did bring to and attempt to
13 bring to the United States said alien for the purpose of commercial
14 advantage and private financial gain; in violation of Title 8, United
15 States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States
16 Code, Section 2.

17 Count 22

18 On or about January 10, 2006, within the Southern District of
19 California, defendant MARISELA CASTRO-JUAREZ, with the intent to
20 violate the immigration laws of the United States, knowing and in
21 reckless disregard of the fact that an alien, namely, David Gonzalo
22 Noriegaj-Velazquez, had not received prior official authorization to
23 come to, enter and reside in the United States, did bring to and
24 attempt to bring to the United States said alien for the purpose of
25 commercial advantage and private financial gain; in violation of
26 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
27 United States Code, Section 2.

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Count 23

On or about January 17, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Sandoval-Franco, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 24

On or about January 31, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Araceli Alonso-Andres, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 25

On or about February 1, 2006, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Artemio Hernandez-Hernandez, had not received prior official authorization to

1 come to, enter and reside in the United States, did bring to and
2 attempt to bring to the United States said alien for the purpose of
3 commercial advantage and private financial gain; in violation of
4 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
5 United States Code, Section 2.

6 Count 26

7 On or about March 12, 2006, within the Southern District of
8 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,
9 with the intent to violate the immigration laws of the United States,
10 knowing and in reckless disregard of the fact that an alien, namely,
11 Leticia Casillas Sasillas, had come to, entered and remained in the
12 United States in violation of law, did transport and move and attempt
13 to transport and move said alien within the United States in
14 furtherance of such violation of law; in violation of Title 8, United
15 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

16 Count 27

17 On or about March 12, 2006, within the Southern District of
18 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,
19 with the intent to violate the immigration laws of the United States,
20 knowing and in reckless disregard of the fact that an alien, namely,
21 Diego Gonzalez-Rojas, had come to, entered and remained in the United
22 States in violation of law, did transport and move and attempt to
23 transport and move said alien within the United States in furtherance
24 of such violation of law; in violation of Title 8, United States Code,
25 Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 28

On or about March 21, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Arecelia Barroso-Duran, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 29

On or about March 21, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and LORENZO PECORARO, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Elena Flores-Cruz, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 30

On or about April 13, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Manuel Cruz-Cruz, had not received prior official authorization to come to, enter and reside in the United States, did bring to and attempt to bring to the United States said alien for the purpose of

1 commercial advantage and private financial gain; in violation of
2 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
3 United States Code, Section 2.

4 Count 31

5 On or about April 13, 2006, within the Southern District of
6 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
7 with the intent to violate the immigration laws of the United States,
8 knowing and in reckless disregard of the fact that an alien, namely,
9 Gabriel Zapata-Cruz, had not received prior official authorization to
10 come to, enter and reside in the United States, did bring to and
11 attempt to bring to the United States said alien for the purpose of
12 commercial advantage and private financial gain; in violation of
13 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
14 United States Code, Section 2.

15 Count 32

16 On or about April 13, 2006, within the Southern District of
17 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
18 with the intent to violate the immigration laws of the United States,
19 knowing and in reckless disregard of the fact that an alien, namely,
20 Marcial Santiago-Cruz, had not received prior official authorization
21 to come to, enter and reside in the United States, did bring to and
22 attempt to bring to the United States said alien for the purpose of
23 commercial advantage and private financial gain; in violation of
24 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
25 United States Code, Section 2.

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Count 33

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jaime Almanza-Tinoco, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 34

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Sergio Aurelio Aguirre-Tinoco, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 35

On or about July 16, 2006, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juan Sanchez-Cortez, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance

1 of such violation of law; in violation of Title 8, United States Code,
2 Sections 1324(a)(1)(A)(ii) and (v)(II).

3 Count 36

4 On or about August 2, 2006, within the Southern District of
5 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
6 with the intent to violate the immigration laws of the United States,
7 knowing and in reckless disregard of the fact that an alien, namely,
8 Lorenzo Castillo-Mendez, had come to, entered and remained in the
9 United States in violation of law, did transport and move and attempt
10 to transport and move said alien within the United States in
11 furtherance of such violation of law; in violation of Title 8, United
12 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

13 Count 37

14 On or about August 2, 2006, within the Southern District of
15 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
16 with the intent to violate the immigration laws of the United States,
17 knowing and in reckless disregard of the fact that an alien, namely,
18 Alfredo Herrera-Hernandez, had come to, entered and remained in the
19 United States in violation of law, did transport and move and attempt
20 to transport and move said alien within the United States in
21 furtherance of such violation of law; in violation of Title 8, United
22 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

23 Count 38

24 On or about August 2, 2006, within the Southern District of
25 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
26 with the intent to violate the immigration laws of the United States,
27 knowing and in reckless disregard of the fact that an alien, namely,
28 Martin Castillo-Mendez, had come to, entered and remained in the

1 United States in violation of law, did transport and move and attempt
2 to transport and move said alien within the United States in
3 furtherance of such violation of law; in violation of Title 8, United
4 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

5 Count 39

6 On or about August 14, 2006, within the Southern District of
7 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
8 with the intent to violate the immigration laws of the United States,
9 knowing and in reckless disregard of the fact that an alien, namely,
10 Yesica Villa-Garcia, had come to, entered and remained in the United
11 States in violation of law, did transport and move and attempt to
12 transport and move said alien within the United States in furtherance
13 of such violation of law; in violation of Title 8, United States Code,
14 Sections 1324(a)(1)(A)(ii) and (v)(II).

15 Count 40

16 On or about August 14, 2006, within the Southern District of
17 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
18 with the intent to violate the immigration laws of the United States,
19 knowing and in reckless disregard of the fact that an alien, namely,
20 Daniel Mentencur-Alvarado, had come to, entered and remained in the
21 United States in violation of law, did transport and move and attempt
22 to transport and move said alien within the United States in
23 furtherance of such violation of law; in violation of Title 8, United
24 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

25 Count 41

26 On or about August 14, 2006, within the Southern District of
27 California, defendants MARISELA CASTRO-JUAREZ and RANDAL MARK PANTER,
28 with the intent to violate the immigration laws of the United States,

1 knowing and in reckless disregard of the fact that an alien, namely,
2 Vicente Villa-Marin, had come to, entered and remained in the United
3 States in violation of law, did transport and move and attempt to
4 transport and move said alien within the United States in furtherance
5 of such violation of law; in violation of Title 8, United States Code,
6 Sections 1324(a)(1)(A)(ii) and (v)(II).

7 Count 42

8 On or about October 25, 2006, within the Southern District of
9 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with
10 the intent to violate the immigration laws of the United States,
11 knowing and in reckless disregard of the fact that an alien, namely,
12 Jesus Bravo-Rascon, had come to, entered and remained in the United
13 States in violation of law, did transport and move and attempt to
14 transport and move said alien within the United States in furtherance
15 of such violation of law; in violation of Title 8, United States Code,
16 Sections 1324(a)(1)(A)(ii) and (v)(II).

17 Count 43

18 On or about October 25, 2006, within the Southern District of
19 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with
20 the intent to violate the immigration laws of the United States,
21 knowing and in reckless disregard of the fact that an alien, namely,
22 Eric Arnoldo Meza-Rodriguez, had come to, entered and remained in the
23 United States in violation of law, did transport and move and attempt
24 to transport and move said alien within the United States in
25 furtherance of such violation of law; in violation of Title 8, United
26 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 44

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jorge Hernandez-Benitez, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 45

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Maria Oseguera-Oseguera, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 46

On or about February 15, 2007, within the Southern District of California, defendants MARISELA CASTRO-JUAREZ, RANDAL MARK PANTER and JOSE PARADA-VELAZQUEZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juli Montes-Garcia, had come to, entered and

1 remained in the United States in violation of law, did transport and
2 move and attempt to transport and move said alien within the United
3 States in furtherance of such violation of law; in violation of
4 Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

5 Count 47

6 On or about March 10, 2007, within the Southern District of
7 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with
8 the intent to violate the immigration laws of the United States,
9 knowing and in reckless disregard of the fact that an alien, namely,
10 Leonardo Perez-Cortez, had come to, entered and remained in the United
11 States in violation of law, did transport and move and attempt to
12 transport and move said alien within the United States in furtherance
13 of such violation of law; in violation of Title 8, United States Code,
14 Sections 1324(a)(1)(A)(ii) and (v)(II).

15 Count 48

16 On or about March 10, 2007, within the Southern District of
17 California, defendants MARISELA CASTRO-JUAREZ and DAVID MONTES, with
18 the intent to violate the immigration laws of the United States,
19 knowing and in reckless disregard of the fact that an alien, namely,
20 Erendia Lopez-Cruz, had come to, entered and remained in the United
21 States in violation of law, did transport and move and attempt to
22 transport and move said alien within the United States in furtherance
23 of such violation of law; in violation of Title 8, United States Code,
24 Sections 1324(a)(1)(A)(ii) and (v)(II).

25 Count 49

26 On or about August 1, 2007, within the Southern District of
27 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,
28 with the intent to violate the immigration laws of the United States,

1 knowing and in reckless disregard of the fact that an alien, namely,
2 Elizabeth Zamora-Perez, had come to, entered and remained in the
3 United States in violation of law, did transport and move and attempt
4 to transport and move said alien within the United States in
5 furtherance of such violation of law; in violation of Title 8, United
6 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

7 Count 50

8 On or about August 1, 2007, within the Southern District of
9 California, defendants MARISELA CASTRO-JUAREZ and JOHN WALTER SCHUH,
10 with the intent to violate the immigration laws of the United States,
11 knowing and in reckless disregard of the fact that an alien, namely,
12 Pedro Ruiz-Silva, had come to, entered and remained in the United
13 States in violation of law, did transport and move and attempt to
14 transport and move said alien within the United States in furtherance
15 of such violation of law; in violation of Title 8, United States Code,
16 Sections 1324(a)(1)(A)(ii) and (v)(II).

17 Count 51

18 On or about January 25, 2008 within the Southern District of
19 California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA
20 MAFNAS, with the intent to violate the immigration laws of the United
21 States, knowing and in reckless disregard of the fact that an alien,
22 namely, Teresa Hernandez Samano, had come to, entered and remained in
23 the United States in violation of law, did transport and move and
24 attempt to transport and move said alien within the United States in
25 furtherance of such violation of law; in violation of Title 8, United
26 States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 52

On or about January 25, 2008 within the Southern District of California, defendants MARISELA CASTRO-JUAREZ and MARISA MELENA MAFNAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Jose Hernandez Samano, had come to, entered and remained in the United States in violation of law, did transport and move and attempt to transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 53

(Engaging in Monetary Transactions in Property
Derived from Specified Unlawful Activity)

On or about August 28, 2003, within the Southern District of California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and attempt to engage in a monetary transaction by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit of funds in the amount of a \$44,300 cashier's check number 2015371513, payable to defendant MARISELA CASTRO-JUAREZ, into Bank of America account no. xxxxxx7755, such property having been derived from a specified unlawful activity, that is a violation of Title 8, United States Code, Section 1324(a) (bringing in, transporting, or harboring illegal aliens, or conspiracy to commit such offense); in violation of Title 18, United States Code, Section 1957, and Section 2.

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1 (bringing in, transporting, or harboring illegal aliens, or conspiracy
2 to commit such offense); in violation of Title 18, United States Code,
3 Section 1957, and Section 2.

4 Count 56

5 (Engaging in Monetary Transactions in Property
6 Derived from Specified Unlawful Activity)

7 On or about May 20, 2004, within the Southern District of
8 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and
9 attempt to engage in a monetary transaction by, through, or to a
10 financial institution, affecting interstate and foreign commerce, in
11 criminally derived property of a value greater than \$10,000, that is
12 the payment of a \$20,000 Bank of America cashier's check
13 number 2017177948 to McMillin Escrow, such property having been
14 derived from a specified unlawful activity, that is a violation of
15 Title 8, United States Code, Section 1324(a) (bringing in,
16 transporting, or harboring illegal aliens, or conspiracy to commit
17 such offense); in violation of Title 18, United States Code,
18 Section 1957, and Section 2.

19 Count 57

20 (Engaging in Monetary Transactions in Property
21 Derived from Specified Unlawful Activity)

22 On or about July 19, 2004, within the Southern District of
23 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and
24 attempt to engage in a monetary transaction by, through, or to a
25 financial institution, affecting interstate and foreign commerce, in
26 criminally derived property of a value greater than \$10,000, that is
27 the deposit of funds in the amount of \$16,000 into Bank of America
28 account no. xxxxxx7755, such property having been derived from a

1 specified unlawful activity, that is a violation of Title 8, United
2 States Code, Section 1324(a) (bringing in, transporting, or harboring
3 illegal aliens, or conspiracy to commit such offense); in violation
4 of Title 18, United States Code, Section 1957, and Section 2.

5 Count 58

6 (Engaging in Monetary Transactions in Property
7 Derived from Specified Unlawful Activity)

8 On or about July 12, 2006, within the Southern District of
9 California, defendant MARISELA CASTRO-JUAREZ, did knowingly engage and
10 attempt to engage in a monetary transaction by, through, or to a
11 financial institution, affecting interstate and foreign commerce, in
12 criminally derived property of a value greater than \$10,000, that is
13 the withdrawal of funds in the amount of \$10,500 from Bank of America
14 account no. xxxxxx7755, such property having been derived from a
15 specified unlawful activity, that is a violation of Title 8, United
16 States Code, Section 1324(a) (bringing in, transporting, or harboring
17 illegal aliens, or conspiracy to commit such offense); in violation
18 of Title 18, United States Code, Section 1957, and Section 2.

19 Counts 59-77

20 (Laundering of Monetary Instruments)

21 On or about the dates listed in the chart below, within the
22 Southern District of California, defendant MARISELA CASTRO-JUAREZ, did
23 knowingly conduct and attempt to conduct the financial transactions
24 listed in the chart below, affecting interstate and foreign commerce,
25 which involved the proceeds of a specified unlawful activity, that is
26 a violation of Title 8, United States Code, Section 1324(a) (bringing
27 in, transporting, or harboring illegal aliens, or conspiracy to commit
28 such offense), knowing that the transaction was designed in whole and

in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions, that is funds in the amounts listed in the chart below, represented the proceeds of some form of unlawful activity:

COUNT	DATE	TRANSACTION
59	5/21/2003	Deposit of \$9,950 cash into Bank of America account no. xxxxxx7755.
60	9/23/2003	Withdrawal of \$5,000 cash from Bank of America account no. xxxxxx7755.
61	9/24/2003	Withdrawal of \$9,000 cash from Bank of America account no. xxxxxx7755.
62	11/24/2003	Withdrawal of \$9,500 cash from Bank of America account no. xxxxxx7755.
63	3/15/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
64	4/7/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
65	7/30/2004	Deposit of \$9,900 cash into Bank of America account no. xxxxxx7755.
66	1/13/2005	Deposit of \$9,000 cash into Bank of America account no. xxxxxx7755.
67	1/18/2005	Deposit of \$1,900 cash into Bank of America account no. xxxxxx7755.
68	2/14/2005	Deposit of \$9,950 cash into Bank of America account no. xxxxxx7755.
69	2/24/2005	Deposit of \$4,000 cash into Bank of America account no. xxxxxx7755.
70	11/3/2005	Deposit of \$4,500 cash into Bank of America account no. xxxxxx7755.
71	11/7/2005	Deposit of \$6,500 cash into Bank of America account no. xxxxxx7755.
72	11/29/2005	Deposit of \$7,500 cash into Bank of America account no. xxxxxx7755.

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
73	11/29/2005	Deposit of \$6,700 cash into Bank of America account no. xxxxxx7755.
74	12/8/2005	Deposit of \$9,300 cash into Bank of America account no. xxxxxx7755.
75	12/12/2005	Deposit of \$2,000 cash into Bank of America account no. xxxxxx7755.
76	2/21/2006	Deposit of \$5,500 cash into Bank of America account no. xxxxxx7755.
77	2/28/2006	Deposit of \$4,500 cash into Bank of America account no. xxxxxx7755.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii), and Section 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 through 52 of this Indictment are realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982(a)(6).

2. Upon conviction of one or more of the offenses alleged in Counts 1 through 52, which involve violations of Title 8, United States Code, Section 1324(a), and pursuant to Title 18, United States Code, Section 982(a)(6), defendants MARISELA CASTRO-JUAREZ; DAVID MONTES; JULIE HERNANDEZ; RANDAL MARK PANTER; MARISA MELENA MAFNAS; LORENZO PECORARO; JOSE PARADA-VELAZQUEZ; and JOHN WALTER SCHUH, shall forfeit to the United States all their rights, title and interest in the following: (a) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the defendant is convicted; (b) any property real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or

1 indirectly from the commission of the offense of which the defendant
2 is convicted; and (c) any property real or personal, that is used to
3 facilitate, and is intended to be used to facilitate, the commission
4 of the offense of which the defendant is convicted; this property
5 includes but is not limited to the following:

6 a. A sum of money equal to, but not limited to, at least
7 \$598,775.00 in United States currency, representing
8 the amount of proceeds obtained as a result of the
9 violation of Title 8, United States Code,
10 Section 1324(a), for which defendants MARISELA CASTRO-
11 JUAREZ; DAVID MONTES; JULIE HERNANDEZ; RANDAL MARK
12 PANTER; MARISA MELENA MAFNAS; LORENZO PECORARO; JOSE
13 PARADA-VELAZQUEZ; and JOHN WALTER SCHUH are jointly
14 and severally liable.

15 b. All that lot of parcel of land, together with its
16 buildings, appurtenances, improvements, fixtures,
17 attachments, and easements, located at 1514 Amador
18 Street, Chula Vista, California, more particularly
19 described as:

20 **Lot 41 of Chula Vista Tract No. 96-04, Otay Ranch**
21 **Village 1 Neighborhood R-8, according to map**
22 **thereof no. 13761, filed in the Office of the**
23 **County Recorder of San Diego County on April 16,**
24 **1999 as instrument no. 99-257169 of official**
25 **records.**

26 3 The allegations contained in Counts 53 through 77 are
27 realleged and by reference fully incorporated herein for the purpose
28 of alleging forfeiture to the United States of America.

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above in Paragraph 2.

All pursuant to Title 18, United States Code, Section 982(a).

DATED: March 7, 2008.

A TRUE BILL:

A. Perle

KAREN P. HEWITT
United States Attorney

By: Steve Miller
STEVE MILLER
Assistant U.S. Attorney